

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIAUNITED STATES OF AMERICA :  
v. :  
BHASKAR SAVANI et al. :  
:GOVERNMENT'S NOTICE TO THE COURT

The government makes this filing to inform the Court and the parties of a post-indictment inadvertent release of documents to the trial team, which documents had been preliminarily screened for privilege, but not yet fully reviewed for privilege. The filter team has reviewed these documents, has assessed that some may not be privileged at all, and those that are arguably privileged are nevertheless irrelevant, thus accruing no prejudice to the already-indicted defendants. As detailed below, this filing is made by the filter review attorneys, who have investigated the spillage. Along with this filing, we are providing the Court and counsel with a separate sealed filing containing the documents determined to be potentially privileged or work product<sup>1</sup> that were opened by the current members of the trial team (Sealed Exhibit A). Also attached to this Notice is a list of the bates-stamp numbers of all 2,382 documents that were opened by any person currently or formerly associated with the government, whether or not those documents were determined to be potentially privileged/work product, to aid the defense should the defense choose to raise the status of any of those documents with the Court.

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<sup>1</sup> Some of the spilled documents are potentially privileged and others appear to be potential attorney work product. As the Court is aware, the protection afforded attorney work product is not absolute. Attorney work product is entitled to a lower level of protection than privileged communications, depending on the extent to which the work product contains the attorney's mental impressions or conclusions. For purposes of this Notice, we are not distinguishing between potentially privileged communications and potential work product.

## I. FACTUAL BACKGROUND

From February 2009 through in or about November 2021, the defendants in this case, Bhaskar, Arun and Niranjan Savani, Aleksandra Radomiak and Sunil Phillip, with others, engaged in a pattern of racketeering activity, including: (i) visa fraud; (ii) wire fraud involving the Medicaid program; (iii) concealment money laundering; (iv) transactional money laundering; (v) obstruction of justice; and (vi) mail fraud involving the implantation of unapproved medical devices.

The defendants undertook all of this unlawful conduct in an effort to sustain and grow their sprawling dental empire. That enterprise, based here in the Eastern District of Pennsylvania, included general and specialty dental practices throughout the United States, back office service operations in Pennsylvania and India, a dental supply business, real estate operations, and the Osseolink dental implant supply company.

The racketeering enterprise conducted through the defendants' far-flung dental venture extends back at least as far as February 2009. The defendants' criminal activities required a compliant and underpaid workforce to staff their dental offices and backroom operations. The defendants met this need through fraudulent manipulation of the H1-B foreign worker program. Through false applications to the U.S. Department of Labor and the Customs and Immigration Service, the defendants obtained permission to employ foreign workers in highly technical specialized fields such as bioengineering and chemistry. Instead, however, the defendants employed their foreign workers in entirely different endeavors, such as dental office managers, billing managers, and a janitor. Worse yet, the defendants unlawfully demanded that their employees kick back to the Savanis a portion of their salaries as well as the fees that the Savanis were legally obligated to pay on the foreign workers' behalf. Sometimes the defendants extracted these illegal payments in the form of cash or check and at other times it was in the form of under-the-table employment from spouses who were prohibited from working in the United States. The

defendants directed and encouraged their employees to deceive government agents and agencies about the circumstances of their employment, ultimately resulting in the making of perjured testimony before a federal grand jury.

To extract additional funds for their own personal benefit and for the benefit of their enterprise, the defendants carried out a campaign of submitting false claims to health insurance companies, including the Pennsylvania Medicaid program through the Commonwealth's Medicaid contractors. This persistent scheme, which the defendants euphemistically labeled "supervisory billing," involved submitting claims for reimbursement that identified an approved medical provider as the treating dentist although the services (assuming they were actually performed) had been performed by a different individual, often one who was unapproved or uncredentialed by the company to which the claim had been submitted.

When this repeated deception was discovered, the Savani dental practices were terminated from participation by certain Pennsylvania Medicaid contractors in late 2012. Rather than limit themselves to private insurers that had not excluded them from participation, the defendants sought to continue profiting from the Medicaid program by establishing two nominee dental practices. Although they in fact controlled both practices behind the scenes, the defendants and their co-conspirator nominee dentists maintained and represented that these practices were independent of the Savanis in general, and Bhaskar Savani in particular. Through this deception, the defendants reacquired lucrative Medicaid contacts. Worse yet, the defendants continued to submit false and fraudulent claims to various insurance companies.

To perpetuate the fraud and avoid detection, the defendants concealed and laundered income to their companies and themselves personally, evaded taxes, and used their companies to fund their lavish lifestyles through fraudulent business expenses such as the purchase and upkeep of vehicles and real estate. The defendants also sought to increase the profitability of their dental

implant company, Osseolink, by substantially altering the design and functioning of the FDA approved product that the company produced. However, rather than comply with the mandatory practices required by the FDA to obtain approval for these alterations, the defendants engaged in an unapproved and unregistered program in which their own patients were the unwitting test subjects for the defendants' surgical implantation experiments.

## II. PROCEDURAL HISTORY

On January 18, 2023, a grand jury sitting in this district returned a 42-count indictment charging 12 defendants with a variety of crimes, including an obstruction of justice conspiracy, in violation of 18 U.S.C. § 371; RICO conspiracy, in violation of 18 U.S.C. § 1962(d); conspiracy to commit visa fraud and visa fraud, in violation of 18 U.S.C. §§ 371 and 1546; conspiracy to commit health care fraud and health care fraud, in violation of 18 U.S.C. §§ 1347 and 1349; conspiracy to commit money laundering and money laundering, in violation of 18 U.S.C. §§ 1956 and 1957; a tax fraud conspiracy and a tax wire fraud scheme, in violation of 18 U.S.C. §§ 371 and 1343; and conspiracy to distribute an adulterated and misbranded dental device in interstate commerce, in violation of 18 U.S.C. § 371.

At present, seven defendants are scheduled to proceed to trial: Bhaskar, Arun and Niranjan Savani; Aleksandra Radomiak; Sunil Phillip, Bharatkumar Parsana; and Hitesh Goyani.

## III. THE SPILLAGE

This filing addresses a post-indictment inadvertent release of documents to the trial team, which documents had been preliminarily screened for privilege, but not yet fully reviewed for privilege. In June 2019, a privilege review protocol was put in place. Under that protocol, documents that might contain attorney-client privileged or work product information were subject to an algorithm that searched for certain key words including (1) the names and email addresses of criminal defense attorneys and their staff known to have provided legal counsel to the Savani

Group, and (2) the names and email addresses of other attorneys and their staff known or reported to have provided legal counsel to the Savani Group. Only documents that passed the algorithm, that is, documents that did not contain any of these names or addresses, were put into the database that was accessible to the trial team. Documents that failed the algorithm were supposed to be provided to the trial team only after being reviewed and approved by an Assistant United States Attorney (“AUSA”) on the filter team.

Once the indictment was returned in January 2023, at the same time that the filter review was taking place, all of the incoming documents were provided unfiltered to defense counsel, to avoid the possibility that exculpatory material might be unintentionally withheld from the defense. Because the lead defendants were operating under a joint defense agreement, a decision was made to give all defense counsel all of the unfiltered documents, a plan to which defense counsel voiced no objection. This process resulted in two parallel streams of information: an unfiltered set of documents was provided in discovery to all defense counsel, and a filtered set of documents was to be put in the Relativity database to which the trial team had access.

The total spillage, which took place a little more than a year after the indictment was returned, that is, on or about February 6, 2024, was of approximately 54,082 documents. Of those 54,082 documents, log files of Relativity show that 51,700 were not opened by anyone. Accordingly, those 51,700 documents can be disregarded. This leaves 2,382 documents that were opened by someone working for the government after being inadvertently placed in the Relativity database that was accessible to the trial team.<sup>2</sup> The spillage occurred when an employee of the IT department of the United States Attorney’s Office (“USAO”) misunderstood directions given

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<sup>2</sup> The history is taken from the log files of Relativity. All activity in Relativity is done remotely as the data is stored at the Department of Justice’s litigation support center in Columbia, SC. The logs are kept there as well.

about sending unfiltered documents to the defense, and believed he should also place the documents in the Relativity database that was accessible to the trial team. Because of this misunderstanding, he placed the 54,082 documents in the Relativity database to which the trial team had access. These 54,082 documents, along with others, were produced to the defense in discovery under cover of a discovery letter dated March 1, 2024. See Exhibit B, attached.

The government did not discover the spillage until approximately one year and four months later, on or about June 11, 2025, when a member of the trial team (who is no longer on the case and no longer employed by the office) alerted the IT department of the USAO that possibly privileged documents appeared to be in the database to which the trial team had access. That same day, the 54,082 spilled documents were removed from the trial team's data base access, so that no member of the trial team could access them, and they have remained locked down ever since.

All of the 54,082 electronic documents are loaded in the Relativity database program. Relativity is a database that can manage large numbers of electronic documents. Log files of Relativity make a record of whether, and for how long, documents were opened in Relativity. A review of the Relativity database shows that of the 54,082 spilled documents, persons working for the government, including current and past members of the trial team and one consultant, opened just 2,382 of the 54,082 documents before those documents were locked down on June 11, 2025. Of the 2,382 documents that were opened by current or former members of the trial team, only 690 were opened by current members of the trial team. Of the 690 opened documents, a privilege review shows that current members of the trial team opened a total of only 16 possibly privileged/work product documents. The Relativity Log files show that the 16 privileged/work product documents were opened by current members of the trial team for time periods ranging

from one second to 25 minutes.<sup>3</sup> Indeed, these Relativity Log files reveal that many documents were quickly scanned, as they were not opened long enough for anyone to have absorbed their contents. Specifically, the length of screen time each of these documents was exposed to a member of the prosecution team is as follows:

Document 1	15 seconds (to agent)
Document 2	1 second (to AUSA)
Document 3	2 seconds (to AUSA)
Document 4	55 seconds (to agent)
Document 5	2 seconds (to agent)
Document 6	1 second (to agent)
Document 7	1 second (to agent)
Document 8	1 second (to agent)
Document 9	12 seconds (to agent)
Document 10	52 seconds (to agent)
Document 11	35 seconds (to agent)
Document 12	25 seconds (to forensic accountant)
Document 13	1 minute and 52 seconds (to USAO paralegal)
Document 14	15 seconds (to USAO paralegal)
Document 15	2 minutes and 54 seconds (to former AUSA) 17 seconds (to agent)
Document 16	25 minutes (to agent)

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<sup>3</sup> There is no way to know if the users looked at the document the entire time it was opened. Relativity tracks what the computer is doing, not what the computer user is doing. If someone walked into the office of the trial team member, or if that trial team member answered a telephone call, or was otherwise distracted during the period when the document was open, Relativity cannot ascertain that information.

Those 16 privileged documents have been provided to the Court and the defense in a sealed binder, marked Sealed Exhibit A. Attached to Sealed Exhibit A is the filter review attorneys' explanation of why we believe these documents, while possibly privileged or work product, are not relevant to any issue in this criminal case, and that their inadvertent disclosure results in no prejudice to the defendants. It is also noteworthy that none of the 16 possibly privileged/work product documents concern any of the defendants' criminal defense lawyers.

In addition, as mentioned above, Exhibit A to this filing is a list of the bates-stamp numbers of all of the 2,382 documents that were inadvertently released to the trial team and opened by anyone associated with the government. We attach this list of bates numbers in order to direct counsel to each spilled document that was opened by anyone associated with the government, should the defense wish to raise the status of any of these documents, even though the defense received those documents on March 1, 2024, a year and five months ago (See Exhibit B).

Upon a review, the filter review attorneys have determined that while 16 of the 690 documents opened by current members of the trial team are privileged/work product, and 60 of the 644 documents opened by past members of the trial team are privileged/work product, and 44 of the 1016 documents opened by the consultant described below are privileged/work product, none of these documents are relevant to the criminal case. For ease of reference, we include a chart of the spilled and opened documents below.

Status	Documents Viewed	Privileged/WP documents
Current trial team	690	16
Former trial team	644	60
DOJ consultant	1016	44
IT	32	18
Total	2382	138

In addition to the 16 privileged documents opened by current members of the trial team, and the 78 privileged documents opened by past members of the trial team and other government

personnel, approximately 1,061 documents from the set of 2,382 opened documents were opened by a consultant who works as a contractor for the Department of Justice’s Money Laundering and Asset Recovery Section (the “DOJ consultant”). Of those, 44 documents were determined by the filter review attorneys to be privileged/work product. The DOJ consultant is a Certified Public Accountant and Certified Fraud Examiner who has worked for DOJ in this capacity since 2019. He is not anticipated to be a witness at trial.

Although the DOJ consultant will not testify, he has assisted the trial team in two primary ways: (i) in explaining the financial crime network charged in the indictment; and (ii) in reviewing real and personal property records and financial transactions related to real and personal property purchases to assess potential forfeiture.

Based upon information provided to him by case agents, the DOJ consultant followed the money flow to the Savani Group-controlled dental practices from Managed Care Organizations (“MCOs”) responsible for Medicaid payments. This tracing nearly exclusively required review of billing information and financial documents, though he would also review the Secretary of State documents concerning ownership of entities receiving MCO funds, contracting documents, tax documents, and loan documents related to the Savani Group entities.

In addition, the DOJ consultant assisted the prosecution team to identify and determine the ownership status of assets – real and personal property – connected to the Savani Group Enterprise and the funds used to purchase those assets. It too required the DOJ consultant to review banking statements, along with deeds, leases, financing documents, contracts, and other documents related to ownership. Finally, at the direction of the prosecution team, the DOJ consultant obtained and reviewed information maintained in the prosecution team’s Relativity database to identify funds used to purchase the real or personal property.

A privilege review of the 1,016 documents opened by the DOJ consultant shows that 44 documents were potentially privileged/work product. These documents appear to the filter review attorneys to be similar in nature to the 16 privileged documents contained in Sealed Exhibit A, that is, arguably privileged but irrelevant. It also appears that no privileged documents affected nor informed the DOJ consultant's assessments of the evidence or communications to the trial team.

#### THE LAW

While the government regrets the human error that led to the document spillage and the consequent opening of the 16 privileged documents by current members of the trial team, we also wish to stress two things. *First*, the 16 privileged documents that were opened by current members of the trial team were opened after the indictment was returned and so could not possibly have had any bearing on the charges brought. In fact, those 16 privileged documents appear to the filter review attorneys to be irrelevant to this criminal case. Should the defense disagree, they can review the same binder of 16 sealed documents that we are providing to the Court and take whatever action they deem appropriate. Further, the same is true of the 644 documents that were opened by former members of the trial team who have since left the government – the 60 documents that were found by the filter review attorneys to be either potentially privileged or work product are nonetheless irrelevant to the criminal case. And the same appears true of the 1,016 documents opened by the DOJ consultant; the 44 documents that were found by the filter team to be potentially privileged or work product are nonetheless irrelevant to the criminal case. Again, should the defense disagree, they can review the list we have provided of the bates numbers of the 2,382 total spilled documents, and bring any claims to the Court's attention. *Second*, since June 2019, a filter team has been in place. The privilege review system was appropriate; nonetheless, the human error that led to the document spillage, while regrettable, was inadvertent and in no way the result of a lack of attention to the filter review process.

In support of our conclusions, we provide the following outline of the law in this area. Crucially, in order to obtain relief, the defense bears the burden of showing intentional conduct and prejudice. Here, there is neither. We submit that the defense cannot show any prejudice due to the subject matter of the documents and the short time that they were opened, which was not enough time in most cases to even read them. While the government's actions in executing the filter protocol were imperfect, there was no intentional invasion of privilege in opening the documents and no prejudice accruing to the defendants.

#### A. The Law of Outrageous Government Misconduct

As the Third Circuit has noted about this claim, “the doctrine of outrageous government misconduct, although often invoked by defendants, is rarely applied by courts.” *United States v. Voigt*, 89 F.3d 1050, 1065 (3d Cir. 1996).<sup>4</sup> See also *United States v. Fattah*, 858 F.3d 801, 812 (3d Cir. 2017). Moreover, the Third Circuit has noted that it is only applicable in rare, extreme circumstances.

Although the requirement of outrageousness has been stated in several different ways by various courts, the thrust of each of these formulations is that the challenged conduct must be shocking, outrageous, and clearly intolerable.... The cases make it clear that this is an extraordinary defense reserved for only the most egregious circumstances. It is not to be invoked each time the government acts deceptively or participates in a crime that it is investigating. Nor is it intended merely as a device to circumvent the predisposition test in the entrapment defense.

*United States v. Nolan-Cooper*, 155 F.3d 221, 230–31 (3d Cir. 1998), quoting *United States v. Mosley*, 965 F.2d 906, 910 (10th Cir.1992).

As the *Mosley* court put it, “Outrageousness must be determined by reference to the universal sense of justice.” *Id.*

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<sup>4</sup> Or, as the First Circuit put it more colorfully, “The banner of outrageous conduct is often raised but seldom saluted.” *United States v. Santana*, 6 F.3d 1, 4 (1st Cir. 1993), quoted in *Voigt*, 89 F.3d at 1065.

The law appears to recognize at least two “flavors” of such conduct. The first arises when the government is involved in the underlying criminal conduct. *United States v. Russell*, 411 U.S. 423 (1973) (government delivered precursor chemical to the defendant, who used it to manufacture methamphetamine); *Hampton v. United States*, 425 U.S. 484 (1976) (government delivered heroin to defendant who then sold it); *United States v. Twigg*, 588 F.2d 373 (3d Cir. 1978) (government set in motion the idea to set up a meth lab and was actively involved in supplying necessary materials); *United States v. Nolan-Cooper*, 155 F.3d 221 (3d Cir. 1998) (investigating agent had sexual relationship with target of tax investigation).<sup>5</sup> These defendants cannot assert that the government was deeply involved in getting them to commit the fraudulent conduct charged in the indictment, nor can they claim that the government’s actions were “entwined with the events charged.” *Nolan-Cooper*, 155 F.3d at 232.

The court in *Nolan-Cooper* also observed, “Indeed, since *Hampton*, the only opinion upholding the application of the defense is the opinion for a divided panel of this court in *United States v. Twigg*, 588 F.2d 373 (3d Cir. 1978).” *Id.* at 230. The Third Circuit wrote the following about *Twigg* most recently: “Since *Twigg* was decided this Court has repeatedly distinguished and even questioned, its holding.” *United States v. Fattah*, 801 F.3d 813 (footnote and citation omitted).

This first flavor of “outrageous government conduct” case raises a fundamental philosophical question. As the Third Circuit noted in *Fattah*, when writing about *Twigg*: “[i]n short, the Government ‘created the crime for the sole purpose of obtaining a conviction.’ *United States v. Dennis*, 826 F.3d 683, 695 (3d Cir. 2016) (citation omitted).” *United States v. Fattah*, 858

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<sup>5</sup> In *Nolan-Cooper*, the court noted that in this flavor of outrageous government conduct claim, the actions must take place “during or close to the period covered by the indictment,” and they must be “entwined with the events charged.” *Id.* at 232.

F.3d at 813. Where the government “creates the crime,” the idea of dismissal has some logical force, because there is a philosophical question whether a crime has even been committed. However, dismissal loses its logical force as a potential remedy when the government uses some technique, which a defendant or a court finds offensive, to investigate a real crime.<sup>6</sup>

A second “flavor” is closer to this case and involves government “intentional invasion of the defense camp.” The term “intentional invasion of the defense camp” in this context has a very narrow meaning. Courts have only considered it when the government inserts a witness into meetings between a defendant and his attorney. The facts of *United States v. Levy*, 577 F.2d 200 (3d Cir. 1978), demonstrate what the Court means when it speaks of an “intentional invasion.” In that case, the government charged Verna and Visceglia with drug trafficking offenses. The same attorney represented both of them. When they were charged, Visceglia was a government informant and remained one throughout the proceedings. He met with Verna and their joint attorney throughout the case to discuss the defense, even though the attorney and Verna were unaware of his informant status. It is this level of “intentional invasion” that is required.

*United States v. Ofshe*, 817 F.2d 1508, 1515 (11<sup>th</sup> Cir. 1987), demonstrates how high the defense burden is. In *Ofshe*, the government obtained the cooperation of an attorney and had him record discussions with his client. The conversations were about two topics – an ongoing money laundering/drug scheme and the case in which the attorney represented the defendant. The

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<sup>6</sup> It is worth remembering that all of the “outrageous government conduct” cases go back to *Rochin v. California*, 342 U.S. 165 (1952), in which police officers broke into the defendant’s residence. When the defendant swallowed some capsules, the police seized him, took him to a hospital, where they pumped his stomach. The prosecution offered the capsules that he vomited into evidence. Even though the Court found that the police conduct “shocks the conscience” 342 U.S. at 209, the remedy was exclusion of the evidence, not dismissal of the prosecution. Even where the state coerces a confession from a prisoner by creating fear of serious bodily injury or death, the remedy is suppression of the confession and its fruits, not dismissal of the charges. *E.g. Payne v. Arkansas*, 356 U.S. 560 (1958).

discussions about criminal activity other than that for which the attorney was representing him meant that there was no issue with respect to those conversations. *United States v. Voigt*, 89 F.3d 1050, 1066 (3d Cir. 1996) (citing *Ofshe* with approval). The fact that the information about the pending case only related to public information and had not been passed to the prosecutors meant that there was no prejudice to the defense. The court found that the intrusion “was designed to obtain information regarding *Ofshe*’s subsequent criminal conduct and not used to discover defense strategy.” Id. at 1516 (emphasis supplied.)

In *United States v. Mitan*, 499 Fed. Appx. 187 (3d Cir. 2012) (not precedential), the government listened to the defendant’s prison calls, while he was representing himself. Even though the Court held that the government erred in doing so, it found that dismissal was not appropriate. The Court explained just how high the bar was to obtain such relief in the following passage:

Assuming that the presumption of prejudice approach adopted in *Levy* remains viable, *Mitan* cannot avail himself of it because he cannot show that the government intentionally invaded any attorney client relationship. On the contrary, while the government made mistakes, it undertook measures to ensure that it did not invade the defense camp. If any communication concerning legal strategy was intercepted, it was unintentional – certainly far from the level of intentional invasion present in *Levy*.

*Mitan*, 499 Fed. Appx. at 193 (emphasis supplied; footnote omitted).

*United States v. Levy*, 577 F.2d 200, is an old precedent in this circuit that holds that where the defendant can show an invasion of the defense camp, the release of legal strategy, and intentional government conduct, there is no requirement of prejudice. However, the Supreme Court has undoubtedly overruled *Levy*. *Levy* predates the Supreme Court’s decision in *United States v. Morrison*, 449 U.S. 361, and *Levy* was cited as precedent in the Third Circuit’s opinion in *Morrison*, 602 F.2d 529, 533 (3d Cir 1979), *rev’d*, 449 U.S. 361, for the proposition that prejudice was not required. (“Because an attempt to assess the prejudice to the defendant would have been

speculative at best, we held that the intrusion and mere disclosure, without more, was sufficient to make out a sixth amendment violation. In light of the fact that no other relief would remedy the violation and, considering the extent and seriousness of the improper conduct of the government, we found the only appropriate relief for the violation to be dismissal of the indictment.”) The Supreme Court’s opinion in *Morrison* rejected that reasoning and held that there should be no dismissal of charges without a showing of prejudice to the defense. The Third Circuit has recognized, but not yet decided, that *Levy* may have been overruled. *United States v. Mitan*, 499 Fed. Appx. at 192 n. 6 (“We need not address the question of whether *Morrison* precludes the presumption of prejudice approach adopted in *Levy* because *Mitan* cannot show the factual predicate for the presumption: an intentional invasion of the defense camp.”).

The facts as outlined here show a simple human error. It does not come close to intentionally sending a witness to attend a confidential meeting between an attorney and client as in *Levy*, or recruiting an attorney to provide information about his client, as in *Ofshe* and *Voigt*. Indeed, they do not come close to the conduct of the government in *Mitan*, intentionally listening to the calls of a defendant who was representing himself. The Third Circuit held in *Mitan* that even though the government intentionally listened to the defendant’s prison calls while he was representing himself, the government had not intentionally invaded the attorney client privilege. Here, the members of the trial team did not realize that they were opening privileged documents. The conduct of the members of the trial team does not approach that of the agents in *Levy*, *Voigt*, *Ofshe*, or *Mitan*. None of those cases resulted in dismissal. The conduct here may have been regrettable, but it does not come close to meeting the threshold requirement that it be “shocking, outrageous, and clearly intolerable” *Nolan-Cooper*, 155 F.3d 230-31. See also *United States v. Anand*, 2022 WL 3357484 (E.D. Pa. Aug. 15, 2022) (not precedential) (trial team’s viewing of documents containing privileged communications between a defendant and one of his lawyers,

due to errors in conducting the filter review process, did not rise to a Sixth Amendment violation; motion to dismiss indictment or dismiss trial team denied).

#### B. Suppression

As an alternative to dismissal of the Indictment, a defendant might ask the Court to suppress all evidence obtained after the first date on which a member of the trial team looked at one of the 16 documents. That remedy would also be inappropriate for the reasons that follow.

A breach of a privilege without constitutional implications may warrant suppressing the privileged statement, but not any fruits of the privileged information. *Nickel v. Hannigan*, 97 F.3d 403, 409 (10th Cir. 1996) (breach of attorney client privilege does not require suppression of defendant's statement "directly traceable" to the violation of the privilege); *United States v. Warshak*, 631 F.3d 266, 294 (6<sup>th</sup> Cir. 2010); *accord, United States v. Squillacote*, 2212 F.3d 542, 560 (4<sup>th</sup> Cir. 2000) (therapist patient privilege); *United States v. Marashi*, 913 F.2d 724, 731, n.11 (9<sup>th</sup> Cir. 1990) (marital privilege); *United States v. Lefkowitz*, 618 F.2d 1313, 1318 n.8 (9<sup>th</sup> Cir. 1980) (marital privilege).<sup>7</sup> The breaches of the privilege in these reported cases were far more serious than what is involved here. In *Nickel v. Hannigan*, the defendant confessed to his attorney, who disclosed this fact to the police. The defendant sought to suppress his confession to the police because the police had obtained it only after the lawyer told the police about the defendant's confession to him. He asked for suppression because the confession was "directly traceable" to the breach of the attorney client privilege. *Id.*, 97 F.3d at 409. The court rejected the idea that the fruits of a breach of the privilege are suppressible.

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<sup>7</sup> In *Mohawk Indus., Inc. v. Carpenter*, 558 U.S. 100, 101 (2009), the Supreme Court did suggest that suppression of the fruits might be the remedy, but the Court was considering whether the appellant could take an interlocutory appeal and was not deciding this issue.

In *United States v. Warshak*, 631 F.3d 266, the defendant claimed he was entitled to a *Kastigar*-like<sup>8</sup> evidentiary hearing at which the government was required to prove that the agents did not obtain any evidence from their having access to approximately 60,000 e-mail communications to and from his attorneys. *Id.* at 292-293. The court rejected this argument, holding first that a *Kastigar* analysis could only be required when there was compelled testimony. It was not required when there was no compulsion. The court further held that evidence obtained from a breach of a privilege is not subject to a “fruit of the poisonous tree” analysis. The court declined to apply the doctrine beyond the realm of constitutional violations. *Id.* at 294-95.

Here, we are dealing with brief viewings of privileged but irrelevant documents. Suppression of those documents might be appropriate, but the suppression of anything found because of the reading of the documents is not. The concept of suppressing the fruits of a constitutional violation does not carry over to non-constitutional violations of privileges. Certainly, any such remedy that might be requested by the defendants, of either dismissal of the charges, or suppression of everything found after the reading of the documents, whether connected to the

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<sup>8</sup> *Kastigar v. United States*, 406 U.S. 441 (1972).

reading or not, would not be appropriate under the law.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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*/s/ Mary E. Crawley*  
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Assistant United States Attorney

September 10, 2025

## EXHIBIT A

## Exhibit A

Page 1

#	Bates Number
1	USA_DISC_SW-0002736491
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1118	USA_DISC_SW-0003051928
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1551	USA_DISC_SW-0003103293
1552	USA_DISC_SW-0003103300
1553	USA_DISC_SW-0003103307
1554	USA_DISC_SW-0003103344
1555	USA_DISC_SW-0003103512
1556	USA_DISC_SW-0003103514
1557	USA_DISC_SW-0003103531
1558	USA_DISC_SW-0003103533
1559	USA_DISC_SW-0003103559
1560	USA_DISC_SW-0003103561

#	Bates Number
1561	USA_DISC_SW-0003103565
1562	USA_DISC_SW-0003103571
1563	USA_DISC_SW-0003103573
1564	USA_DISC_SW-0003103574
1565	USA_DISC_SW-0003103577
1566	USA_DISC_SW-0003103593
1567	USA_DISC_SW-0003103623
1568	USA_DISC_SW-0003103685
1569	USA_DISC_SW-0003103728
1570	USA_DISC_SW-0003103737
1571	USA_DISC_SW-0003103795
1572	USA_DISC_SW-0003103797
1573	USA_DISC_SW-0003103801
1574	USA_DISC_SW-0003103840
1575	USA_DISC_SW-0003103857
1576	USA_DISC_SW-0003103887
1577	USA_DISC_SW-0003103955
1578	USA_DISC_SW-0003104026
1579	USA_DISC_SW-0003104207
1580	USA_DISC_SW-0003104208
1581	USA_DISC_SW-0003104297
1582	USA_DISC_SW-0003104299
1583	USA_DISC_SW-0003104365
1584	USA_DISC_SW-0003104368
1585	USA_DISC_SW-0003104370
1586	USA_DISC_SW-0003104518
1587	USA_DISC_SW-0003104577
1588	USA_DISC_SW-0003104969
1589	USA_DISC_SW-0003105020
1590	USA_DISC_SW-0003105208
1591	USA_DISC_SW-0003105335
1592	USA_DISC_SW-0003105482
1593	USA_DISC_SW-0003105780
1594	USA_DISC_SW-0003105783
1595	USA_DISC_SW-0003106702
1596	USA_DISC_SW-0003106936
1597	USA_DISC_SW-0003107019
1598	USA_DISC_SW-0003107320
1599	USA_DISC_SW-0003107769
1600	USA_DISC_SW-0003107806

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1601	USA_DISC_SW-0003108350
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1604	USA_DISC_SW-0003109882
1605	USA_DISC_SW-0003109986
1606	USA_DISC_SW-0003109999
1607	USA_DISC_SW-0003110056
1608	USA_DISC_SW-0003110381
1609	USA_DISC_SW-0003110836
1610	USA_DISC_SW-0003110895
1611	USA_DISC_SW-0003111040
1612	USA_DISC_SW-0003111212
1613	USA_DISC_SW-0003113571
1614	USA_DISC_SW-0003113580
1615	USA_DISC_SW-0003113596
1616	USA_DISC_SW-0003114995
1617	USA_DISC_SW-0003115214
1618	USA_DISC_SW-0003115235
1619	USA_DISC_SW-0003115245
1620	USA_DISC_SW-0003115255
1621	USA_DISC_SW-0003115295
1622	USA_DISC_SW-0003115335
1623	USA_DISC_SW-0003115355
1624	USA_DISC_SW-0003115895
1625	USA_DISC_SW-0003115905
1626	USA_DISC_SW-0003115915
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1637	USA_DISC_SW-0003118350
1638	USA_DISC_SW-0003118428
1639	USA_DISC_SW-0003118431
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1646	USA_DISC_SW-0003119924
1647	USA_DISC_SW-0003123858
1648	USA_DISC_SW-0003123978
1649	USA_DISC_SW-0003124521
1650	USA_DISC_SW-0003124791
1651	USA_DISC_SW-0003124836
1652	USA_DISC_SW-0003124931
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1654	USA_DISC_SW-0003124975
1655	USA_DISC_SW-0003125223
1656	USA_DISC_SW-0003125235
1657	USA_DISC_SW-0003127902
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1663	USA_DISC_SW-0003129593
1664	USA_DISC_SW-0003129623
1665	USA_DISC_SW-0003129706
1666	USA_DISC_SW-0003129849
1667	USA_DISC_SW-0003129855
1668	USA_DISC_SW-0003129861
1669	USA_DISC_SW-0003129868
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1671	USA_DISC_SW-0003131685
1672	USA_DISC_SW-0003131920
1673	USA_DISC_SW-0003132543
1674	USA_DISC_SW-0003133606
1675	USA_DISC_SW-0003133618
1676	USA_DISC_SW-0003133630
1677	USA_DISC_SW-0003133919
1678	USA_DISC_SW-0003134301
1679	USA_DISC_SW-0003134536
1680	USA_DISC_SW-0003134556

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1686	USA_DISC_SW-0003138378
1687	USA_DISC_SW-0003143944
1688	USA_DISC_SW-0003143950
1689	USA_DISC_SW-0003145802
1690	USA_DISC_SW-0003145809
1691	USA_DISC_SW-0003145814
1692	USA_DISC_SW-0003146157
1693	USA_DISC_SW-0003146159
1694	USA_DISC_SW-0003147011
1695	USA_DISC_SW-0003147018
1696	USA_DISC_SW-0003147840
1697	USA_DISC_SW-0003151718
1698	USA_DISC_SW-0003151734
1699	USA_DISC_SW-0003151737
1700	USA_DISC_SW-0003152046
1701	USA_DISC_SW-0003152050
1702	USA_DISC_SW-0003152116
1703	USA_DISC_SW-0003152238
1704	USA_DISC_SW-0003152327
1705	USA_DISC_SW-0003152342
1706	USA_DISC_SW-0003152353
1707	USA_DISC_SW-0003152364
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1709	USA_DISC_SW-0003152815
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1711	USA_DISC_SW-0003152837
1712	USA_DISC_SW-0003152876
1713	USA_DISC_SW-0003152943
1714	USA_DISC_SW-0003152964
1715	USA_DISC_SW-0003153005
1716	USA_DISC_SW-0003153017
1717	USA_DISC_SW-0003153030
1718	USA_DISC_SW-0003153046
1719	USA_DISC_SW-0003153059
1720	USA_DISC_SW-0003153073

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1736	USA_DISC_SW-0003153915
1737	USA_DISC_SW-0003153918
1738	USA_DISC_SW-0003153946
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1755	USA_DISC_SW-0003156496
1756	USA_DISC_SW-0003156596
1757	USA_DISC_SW-0003156616
1758	USA_DISC_SW-0003156656
1759	USA_DISC_SW-0003158491
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1764	USA_DISC_SW-0003158559
1765	USA_DISC_SW-0003158579
1766	USA_DISC_SW-0003158580
1767	USA_DISC_SW-0003158603
1768	USA_DISC_SW-0003159729
1769	USA_DISC_SW-0003159747
1770	USA_DISC_SW-0003159825
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1772	USA_DISC_SW-0003159863
1773	USA_DISC_SW-0003159996
1774	USA_DISC_SW-0003160169
1775	USA_DISC_SW-0003160398
1776	USA_DISC_SW-0003160419
1777	USA_DISC_SW-0003160440
1778	USA_DISC_SW-0003160469
1779	USA_DISC_SW-0003160482
1780	USA_DISC_SW-0003160727
1781	USA_DISC_SW-0003160816
1782	USA_DISC_SW-0003160836
1783	USA_DISC_SW-0003160876
1784	USA_DISC_SW-0003160901
1785	USA_DISC_SW-0003160922
1786	USA_DISC_SW-0003160943
1787	USA_DISC_SW-0003160965
1788	USA_DISC_SW-0003161060
1789	USA_DISC_SW-0003161080
1790	USA_DISC_SW-0003161101
1791	USA_DISC_SW-0003161126
1792	USA_DISC_SW-0003161151
1793	USA_DISC_SW-0003161165
1794	USA_DISC_SW-0003161186
1795	USA_DISC_SW-0003161207
1796	USA_DISC_SW-0003161228
1797	USA_DISC_SW-0003161250
1798	USA_DISC_SW-0003161495
1799	USA_DISC_SW-0003161749
1800	USA_DISC_SW-0003162004

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1805	USA_DISC_SW-0003162137
1806	USA_DISC_SW-0003162170
1807	USA_DISC_SW-0003162459
1808	USA_DISC_SW-0003162468
1809	USA_DISC_SW-0003162674
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1811	USA_DISC_SW-0003162749
1812	USA_DISC_SW-0003163019
1813	USA_DISC_SW-0003163025
1814	USA_DISC_SW-0003163053
1815	USA_DISC_SW-0003163250
1816	USA_DISC_SW-0003163262
1817	USA_DISC_SW-0003163309
1818	USA_DISC_SW-0003163391
1819	USA_DISC_SW-0003163529
1820	USA_DISC_SW-0003163534
1821	USA_DISC_SW-0003163549
1822	USA_DISC_SW-0003163556
1823	USA_DISC_SW-0003163564
1824	USA_DISC_SW-0003163573
1825	USA_DISC_SW-0003163581
1826	USA_DISC_SW-0003163732
1827	USA_DISC_SW-0003164148
1828	USA_DISC_SW-0003164187
1829	USA_DISC_SW-0003164254
1830	USA_DISC_SW-0003164302
1831	USA_DISC_SW-0003164312
1832	USA_DISC_SW-0003164332
1833	USA_DISC_SW-0003164364
1834	USA_DISC_SW-0003164380
1835	USA_DISC_SW-0003164760
1836	USA_DISC_SW-0003164768
1837	USA_DISC_SW-0003165295
1838	USA_DISC_SW-0003165298
1839	USA_DISC_SW-0003165301
1840	USA_DISC_SW-0003165304

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1847	USA_DISC_SW-0003165535
1848	USA_DISC_SW-0003165565
1849	USA_DISC_SW-0003165595
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1853	USA_DISC_SW-0003166321
1854	USA_DISC_SW-0003166334
1855	USA_DISC_SW-0003166344
1856	USA_DISC_SW-0003166354
1857	USA_DISC_SW-0003166366
1858	USA_DISC_SW-0003166376
1859	USA_DISC_SW-0003166386
1860	USA_DISC_SW-0003166400
1861	USA_DISC_SW-0003166420
1862	USA_DISC_SW-0003166451
1863	USA_DISC_SW-0003166461
1864	USA_DISC_SW-0003166468
1865	USA_DISC_SW-0003166475
1866	USA_DISC_SW-0003166480
1867	USA_DISC_SW-0003166485
1868	USA_DISC_SW-0003166508
1869	USA_DISC_SW-0003166518
1870	USA_DISC_SW-0003166628
1871	USA_DISC_SW-0003166699
1872	USA_DISC_SW-0003166828
1873	USA_DISC_SW-0003166880
1874	USA_DISC_SW-0003166890
1875	USA_DISC_SW-0003166900
1876	USA_DISC_SW-0003166916
1877	USA_DISC_SW-0003166989
1878	USA_DISC_SW-0003167030
1879	USA_DISC_SW-0003167034
1880	USA_DISC_SW-0003167045

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1883	USA_DISC_SW-0003167642
1884	USA_DISC_SW-0003167782
1885	USA_DISC_SW-0003167851
1886	USA_DISC_SW-0003167962
1887	USA_DISC_SW-0003168060
1888	USA_DISC_SW-0003168110
1889	USA_DISC_SW-0003168120
1890	USA_DISC_SW-0003168195
1891	USA_DISC_SW-0003168393
1892	USA_DISC_SW-0003168403
1893	USA_DISC_SW-0003168413
1894	USA_DISC_SW-0003168439
1895	USA_DISC_SW-0003168449
1896	USA_DISC_SW-0003168459
1897	USA_DISC_SW-0003168495
1898	USA_DISC_SW-0003168523
1899	USA_DISC_SW-0003168533
1900	USA_DISC_SW-0003168551
1901	USA_DISC_SW-0003168561
1902	USA_DISC_SW-0003168571
1903	USA_DISC_SW-0003168575
1904	USA_DISC_SW-0003169282
1905	USA_DISC_SW-0003169630
1906	USA_DISC_SW-0003169640
1907	USA_DISC_SW-0003169644
1908	USA_DISC_SW-0003169654
1909	USA_DISC_SW-0003169813
1910	USA_DISC_SW-0003169840
1911	USA_DISC_SW-0003169841
1912	USA_DISC_SW-0003171191
1913	USA_DISC_SW-0003171305
1914	USA_DISC_SW-0003171645
1915	USA_DISC_SW-0003172800
1916	USA_DISC_SW-0003172833
1917	USA_DISC_SW-0003172843
1918	USA_DISC_SW-0003172865
1919	USA_DISC_SW-0003172885
1920	USA_DISC_SW-0003172889

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#	Bates Number
1921	USA_DISC_SW-0003172893
1922	USA_DISC_SW-0003173060
1923	USA_DISC_SW-0003174374
1924	USA_DISC_SW-0003174384
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1927	USA_DISC_SW-0003174414
1928	USA_DISC_SW-0003174965
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1932	USA_DISC_SW-0003175048
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1934	USA_DISC_SW-0003175110
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1937	USA_DISC_SW-0003175182
1938	USA_DISC_SW-0003175389
1939	USA_DISC_SW-0003175413
1940	USA_DISC_SW-0003175438
1941	USA_DISC_SW-0003175462
1942	USA_DISC_SW-0003175497
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1944	USA_DISC_SW-0003175531
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1946	USA_DISC_SW-0003175592
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1949	USA_DISC_SW-0003175675
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1956	USA_DISC_SW-0003175867
1957	USA_DISC_SW-0003175914
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1959	USA_DISC_SW-0003177704
1960	USA_DISC_SW-0003177796

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1967	USA_DISC_SW-0003179820
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1969	USA_DISC_SW-0003179827
1970	USA_DISC_SW-0003179828
1971	USA_DISC_SW-0003179834
1972	USA_DISC_SW-0003179835
1973	USA_DISC_SW-0003179841
1974	USA_DISC_SW-0003179842
1975	USA_DISC_SW-0003179848
1976	USA_DISC_SW-0003179849
1977	USA_DISC_SW-0003179850
1978	USA_DISC_SW-0003179856
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1980	USA_DISC_SW-0003179858
1981	USA_DISC_SW-0003179864
1982	USA_DISC_SW-0003180054
1983	USA_DISC_SW-0003180055
1984	USA_DISC_SW-0003180078
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1986	USA_DISC_SW-0003180099
1987	USA_DISC_SW-0003180122
1988	USA_DISC_SW-0003180142
1989	USA_DISC_SW-0003180143
1990	USA_DISC_SW-0003180166
1991	USA_DISC_SW-0003180413
1992	USA_DISC_SW-0003180684
1993	USA_DISC_SW-0003181098
1994	USA_DISC_SW-0003181755
1995	USA_DISC_SW-0003181765
1996	USA_DISC_SW-0003181781
1997	USA_DISC_SW-0003181811
1998	USA_DISC_SW-0003182058
1999	USA_DISC_SW-0003182127
2000	USA_DISC_SW-0003182579

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2006	USA_DISC_SW-0003182960
2007	USA_DISC_SW-0003182966
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2009	USA_DISC_SW-0003183213
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2011	USA_DISC_SW-0003183930
2012	USA_DISC_SW-0003183935
2013	USA_DISC_SW-0003184447
2014	USA_DISC_SW-0003184467
2015	USA_DISC_SW-0003184501
2016	USA_DISC_SW-0003184520
2017	USA_DISC_SW-0003185294
2018	USA_DISC_SW-0003185323
2019	USA_DISC_SW-0003185326
2020	USA_DISC_SW-0003185331
2021	USA_DISC_SW-0003185337
2022	USA_DISC_SW-0003185408
2023	USA_DISC_SW-0003185995
2024	USA_DISC_SW-0003186201
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2026	USA_DISC_SW-0003187557
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2034	USA_DISC_SW-0003189944
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2037	USA_DISC_SW-0003190446
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2055	USA_DISC_SW-0003198948
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2058	USA_DISC_SW-0003200126
2059	USA_DISC_SW-0003200582
2060	USA_DISC_SW-0003200591
2061	USA_DISC_SW-0003200606
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2063	USA_DISC_SW-0003200653
2064	USA_DISC_SW-0003200727
2065	USA_DISC_SW-0003200740
2066	USA_DISC_SW-0003200753
2067	USA_DISC_SW-0003201127
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## EXHIBIT B



**U.S. Department of Justice**

*United States Attorney*

*Eastern District of Pennsylvania*

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March 1, 2024

**VIA Email**

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Distribution List Attached

Re: *United States v. Bhaskar Savani, et al.*  
*Criminal No. 23-16*

Dear Counsel:

The government's "5<sup>th</sup> Wave" of discovery is ready for production to you. This production includes approximately 450,000 documents that were recently released to the investigative team from the filter review, documents from AmeriHealth Caritas, agent reports, and subpoena returns, all consistent with the government's ongoing discovery obligations.

Due to the size of the production (a terabyte (1,000GB) in volume and encompassing approximately 630,000 documents), we will need to provide the production to you via 2TB hard drives. Accordingly, please send your hard drives to the attention of Stephanie Shipe at the United States Attorney's Office, 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106. As you will recall from prior productions, your hard drive must be encrypted unless you plan to personally retrieve the drive from our office once the discovery is loaded. Please make sure that your hard drive is labeled with your client's name so that we can keep track, and for security reasons, please email pins or passwords needed to access your hard drive to Stephanie Shipe at [Stephanie.Shipe@usdoj.gov](mailto:Stephanie.Shipe@usdoj.gov). In your email, please include your client's name to facilitate matching passwords/pins with hard drives. Please do not send passwords/pins in the same package as the hard drive.

An index of all bates labeled documents will be included within the production.

All documents being produced in this discovery wave are subject to protection provided in the Order for Protection and Amended Order for Protection.

Sincerely yours,

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United States Attorney

/s *Lesley S. Bonney*

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Assistant United States Attorney

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